

INTEROFFICE CORRESPONDENCE

DATE: October 4, 1990

TO: Those Listed

FROM: *JE* J. E. Evered, Environmental Restoration, Building T130B, X4934SUBJECT: GUIDANCE FOR CONSTRUCTION OR NEAR SOLID WASTE MANAGEMENT UNITS
(SWMUs)

The role of Environmental Restoration (ER) is to determine if any proposed construction activities will impact a designated SWMU area, to provide guidance for preparation of sampling plans, and to direct sampling and laboratory analysis to satisfy EPA and CDH environmental restoration requirements. Additional sampling required by Health and Safety is the responsibility of that group. The project originator, not ER, is responsible for the cost of any sampling and analysis required under ER guidance.

Construction and/or excavation restrictions are applicable to all SWMUs. Several pre-construction restrictions, based on guidance issued jointly by the EPA and CDH, are as follows:

- (1) All proposed major construction in SWMUs must be made known to the EPA and CDH. This will include site drawings showing proposed excavation and construction, as well as a sampling plan showing the nature of the contaminant, sampling methods, analysis methods, and QA/QC procedures.
- (2) SWMU boundaries are not legally defined, i.e., boundaries can't be staked to the nearest foot, and therefore are subject to interpretation. ER must be consulted prior to the start of Title I engineering to determine whether the SWMU is impacted. Additionally, all projects involving excavation must be reviewed by ER to determine whether a SWMU will be impacted by possible ground water flow.
- (3) After a proposed construction project has been deemed to impact a SWMU, a sampling plan will be completed and sampling will be done under ER supervision, at the expense of the project originator. At the completion of sampling, a data report will be generated and presented to EPA and CDH. This is done to assure these agencies that the proposed construction will be accomplished in accordance with present agreements.

Due to time needed to accomplish these pre-construction requirements, a number of weeks should be added to the front end of all construction projects in SWMUs.

ADMIN RECORD

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It should be noted here that EPA and CDH do not intend to "approve" construction plans. Their guidance letters still point out DOE's responsibility in meeting the requirements of environmental laws and regulations. Additionally, they point out that ultimate remediation of the SWMU in which the construction is performed may require the removal of the facilities constructed on the site.

Guidance has also been given for physical construction restrictions within the SWMUs. These are as follows:

- (1) All waste spoils (soil) within the SWMU must remain within that specified unit. The soil may be graded, mounded and used as backfill as long as it can be demonstrated that there will be no danger of distribution outside the SWMU by erosion, wind, or hydraulic (surface or subsurface) action.
- (2) Treatment of waste spoils (soil) and redistribution back into the unit is prohibited.
- (3) Soil brought into the SWMU is to be considered waste spoils, and therefore cannot be removed from the unit once brought in. Transfer of soils between SWMUs is restricted. (Proposed law may allow this in the future under certain circumstances, but such law is still at least a year off.)
- (4) Excavation in or near SWMUs must include consideration of possible encounters with contaminated ground water. Pumping of this ground water from the SWMU is prohibited. Additionally, design of excavations that encounter potentially contaminated ground water must include sampling points (sampling wells) that will remain after construction.
- (5) Excavations in or near SWMUs that may encounter contaminated ground water must ensure that future migration of ground water from the SWMU will not occur. This can be accomplished by designing impervious bulkheads in these excavations at all SWMU boundaries.
- (6) Spoils that cannot be graded, mounded, or used as backfill may be placed in appropriate containers and stored on the SWMU.

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The guidelines presented by EPA and CDH are subject to change; therefore, it is imperative that all SWMU construction be coordinated through J.P. Koffer of Remediation Programs. Jim may be reached at extension 5949.

JPK:rsh

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